

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA  
EASTERN DIVISION**

SELF ADVOCACY SOLUTIONS N.D.,  
LEAGUE OF WOMEN VOTERS OF  
NORTH DAKOTA, MARIA FALLON  
ROMO,

Plaintiffs,

v.

ALVIN JAEGER, in his official capacity as  
Secretary of State, DEBBIE NELSON, in her  
official capacity as County Auditor of Grand  
Forks County,

Defendants.

Case No. 3:20-cv-00071

**JOINT MOTION FOR ENTRY OF AN ORDER ON ATTORNEY FEES AND COSTS**

Plaintiffs and Defendant Alvin Jaeger (the “Secretary”) (collectively, “the Parties”) respectfully submit this notice of settlement and request for an order on attorney fees and costs. The Parties agree that Plaintiffs are prevailing parties in this matter entitled to their reasonable attorneys’ fees and costs. *See 42 U.S.C. § 1988.* The Parties have conferred and agree that a total sum of \$97,500 is a reasonable amount. The Parties respectfully request the Court enter an Order requiring the Secretary to pay the proceeds as follows: (1) Sarah Vogel: \$6,568.30, (2) Braaten Law Firm: \$6,494.41, (3) Campaign Legal Center: \$84,437.29.

A proposed order to this effect is attached.

Dated this 16th day of October, 2020.

State of North Dakota  
Wayne Stenehjem  
Attorney General

By: /s/ Matthew A. Sagsveen  
Matthew A. Sagsveen  
Solicitor General  
State Bar ID No. 05613  
Office of Attorney General  
500 North 9th Street  
Bismarck, ND 58501-4509  
Telephone (701) 328-3640  
Facsimile (701) 328-4300  
Email masagsve@nd.gov

By: /s/ David R. Phillips  
David R. Phillips  
Assistant Attorney General  
State Bar ID No. 06116  
Office of Attorney General  
500 North 9th Street  
Bismarck, ND 58501-4509  
Telephone (701) 328-3640  
Facsimile (701) 328-4300  
Email drphillips@nd.gov

*Attorneys for Defendant.*

By: /s/ Mark P. Gaber  
Mark Gaber  
Danielle Lang\*  
Dana Paikowsky\*#  
Aseem Mulji\*#  
CAMPAIGN LEGAL CENTER  
1101 14th Street NW, Suite 400  
Washington, DC 20005  
Telephone: (202) 736-2200  
mgaber@campaignlegal.org  
dlang@campaignlegal.org  
dpaikowsky@campaignlegal.org  
amulji@campaignlegal.org

\* Admitted *pro hac vice*  
# Licensed in CA only; supervision  
by Danielle Lang, a member of the  
D.C. Bar

By: /s/ Derrick Braaten  
Derrick Braaten  
Derrick Braaten (ND#06394)  
Carey Goetz (ND #05958)  
BRAATEN LAW FIRM  
109 North 4th Street, Suite 100  
Bismarck, ND 58501  
Telephone: (701) 221-2911  
derrick@braatenlawfirm.com  
carey@braatenlawfirm.com

/s/ Sarah M. Vogel  
Sarah M. Vogel (ND#03964)  
SARAH VOGEL LAW FIRM  
P.O. Box 385  
Bismarck, ND 58502-0385  
Telephone: (701) 355-6521  
sarahvogellaw@gmail.com

*Attorneys for Plaintiffs*